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Attorneys for Defendant

TESLA, INC.

UNITED STATES DISTRICT COURT**NORTHERN DISTRICT OF CALIFORNIA**Caleb Mendoza; Eduardo Mendoza and
Maria Mendoza; and Estate of Genesis
Giovanni Mendoza Martinez, by and
through its personal representatives,
Eduardo and Maria Elena Mendoza,

Plaintiffs,

vs.

Tesla, Inc., a Delaware corporation, and
DOES 1 through 100, inclusive,

Defendants.

**PUBLIC RISK INNOVATION SOLUTIONS,
AND MANAGEMENT**

Plaintiff,

vs.

TESLA, INC., a Delaware corporation, and
DOES 1 THROUGH 50, inclusive,

Defendants.

Case No. 3:24-cv-08738-VC

Case No. 3:25-cv-09834-VC (Related)

(Removed from Contra Costa County Superior
Court – Case No. C24-02690)**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONSOLIDATE CASES**

District Judge: Vince Chhabria

Magistrate Judge: Lisa J. Cisneros

Action Filed: October 9, 2024

Trial Date: October 26, 2026

1 Plaintiffs Caleb Mendoza, Eduardo Mendoza, and Maria Mendoza (Mendoza Plaintiffs),
 2 Plaintiff Public Risk Innovation Solutions, and Management (PRISM), and Defendant Tesla, Inc.
 3 (Tesla) (Plaintiffs and Defendant are collectively referred to herein as “the Parties”), jointly enter into
 4 this stipulation to consolidate Case No. 3:24-cv-08738-VC and Case No. 3:25-cv-09834-VC.

5 1. WHEREAS, on October 9, 2024, the Mendoza Plaintiffs filed their Complaint in the
 6 Superior Court for the State of California;

7 2. WHEREAS, on December 24, 2024, Tesla removed the action to the United States
 8 District Court for the Northern District of California (Case No. 3:24-cv-08738-VC);

9 3. WHEREAS, on November 14, 2025, PRISM filed its Complaint in the United States
 10 District Court for the Northern District of California (Case No. 3:25-cv-09834-VC);

11 4. WHEREAS, on December 19, 2025, the Parties attended a case management conference
 12 and were directed to file a stipulation regarding whether both cases should be consolidated by January
 13 2, 2026 (ECF No. 48);

14 5. WHEREAS, the Parties agree that both cases should be consolidated.

15 Accordingly, IT IS HEREBY AGREED, STIPULATED, AND REQUESTED that Case No.
 16 3:24-cv-08738-VC shall be consolidated with Case No. 3:25-cv-09834-VC. Case No. 3:24-cv-
 17 08738-VC shall become the lead case for all purposes.

18 **IT IS SO STIPULATED**

19
 20 Dated: December 31, 2025

Respectfully submitted,

21 **NELSON MULLINS RILEY & SCARBOROUGH**
 22 **LLP**

23 By: /s/ Trevor C. Zeiler
 24 Sandra G. Ezell
 25 Ian G. Schuler
 26 Trevor C. Zeiler
 27 Attorneys for Defendant
 28 TESLA, INC.

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AT LAW
LOS ANGELES

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Dated: December 31, 2025

Respectfully submitted,

SINGLETON SCHREIBER, LLP

By: /s/ Brett J. Schreiber
Brett J. Schreiber
Srinivas Hanumadass
Carmela Birnbaum
Attorneys for Plaintiffs
CALEB MENDOZA, EDUARDO MENDOZA,
AND MARIA MENDOZA, AND ESTATE OF
GENESIS GIOVANNI MENDOZA MARTINEZ

Dated: December 31, 2025

Respectfully submitted,

GROTEFELD HOFFMANN

By: /s/ Margaret L. Sell
Margaret L. Sell
Lilla Shkolnikov
Attorneys for Plaintiff
PUBLIC RISK INNOVATION, SOLUTIONS,
AND MANAGEMENT (PRISM)

[PROPOSED] ORDER

Pursuant to the Parties' Joint Stipulation, and good cause appearing, the Court hereby orders as follows:

Case No. 3:24-cv-08738-VC shall be consolidated with Case No. 3:25-cv-09834-VC. Case No. 3:24-cv-08738-VC shall become the lead case for all purposes.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____
Hon. Vince Chhabria

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AT LAW
LOS ANGELES

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CERTIFICATE OF SERVICE

I hereby certify that on December 31, 2025, I filed the foregoing document entitled ***JOINT STIPULATION AND [PROPOSED] ORDER TO CONSOLIDATE CASES*** with the clerk of court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record in this action.

/s/ Trevor C. Zeiler

Trevor C. Zeiler